

**From:** [Randy Skinner](#)  
**To:** [E-OHPSCA1251.EBSA](#)  
**Subject:** Grandfathered Health Plan Question  
**Date:** Monday, July 12, 2010 2:37:41 PM

---

For Association plans regarding altering annual benefits, how would the proposed grandfathered status regulations be administered for an association plan who has multiple plan choices, or employers within the plan can choose between benefit plans. Would there be any risks of losing grandfathered status if plans were altered or added, yet employers within the association moved to other existing plan choices on their own will?

Also for decreasing the employer contribution rate, what if employers within the association change the rate by 5%, but a small minority. Would the association plan risk losing the grandfathered status if 5%, 10%, 20%, etc. of it's employer members altered their contribution levels for example.